UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN

IN THE MATTER OF AN APPLICATION

OF THE UNITED STATES OF AMERICA

FOR A WARRANT AUTHORIZING THE

10-M- 577

DISCLOSURE OF DATA RELATING TO

A SPECIFIED CELLULAR TELEPHONE

AFFIDAVIT

- I, Scott A. Bates, being first duly sworn, hereby depose and state as follows:
- 1. I am employed as a Special Agent with the United States Department of Homeland Security, U.S. Secret Service, and have been so employed since December of 2005. As a Special Agent, I have received specialized training in identifying counterfeit U.S. currency investigations.
- 2. As part of my duties as a Special Agent, I assist state and local law enforcement agencies by gathering information about persons involved in the manufacture, sale, and distribution of counterfeit U.S. currency.
- 3. I am assisting with a criminal investigation involving the offense(s) of Conspiracy to Distribute and Pass Counterfeit (CFT) Federal Reserve Notes (FRNs) as detailed in Title 18 USC Code 371 and 472. In the course of that investigation, it became apparent that particular information found in cellular call records of 612-570-2745, would be useful to investigators. The information useful to investigators was determined to be available from Verizon, a cellular service provider and communications common carrier as defined in 18 U.S.C. § 2510(10).
- 4. This affidavit is submitted in support of my application for an order authorizing disclosure of data relating to a cellular telephone assigned Verizon number 612-570-2745 (target telephone). All of the information contained in this affidavit is the product of either my own personal observation, my personal investigation or has been provided to me by other Secret Service agents whom I believe to be truthful and reliable. Because

this affidavit is submitted for the limited purpose of securing authorization to receive cell site information from the above-described target telephone, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for an order authorizing receipt of cell site information from the target telephone.

5. This affidavit is based on my experience and background as a law enforcement officer; conversations held with agents and investigators of the U.S. Secret Service; and physical surveillance.

BASIS OF INVESTIGATION

- 6. Corey Terrell Barnes, Rochelle Lynn Roen, and Markeeta Rene Wesley have been identified as being involved in an ongoing scheme involving the continued manufacture, distribution, and uttering of Counterfeit (CFT) Federal Reserve Notes (FRNs) in the Minneapolis, Minnesota, area. In this scheme, evidence indicates that the suspects in the Minneapolis area have been manufacturing CFT FRNs and passing these CFT FRNs at multiple Target Retail Stores for the purchase of multiple types of merchandise. The suspects involved in the investigation then return the merchandise which was purchased with CFT FRNs at a different Target Retail Store to obtain genuine FRNs.
- 7. This investigation has determined that the suspects involved in this investigation have manufactured and passed CFT bearing over seventy (70) different serial numbers. Subsequent investigation has identified the subject CFT FRNs associated to this scheme has totaled \$97,122.
- 8. This investigation revealed that Corey Barnes and Rochelle Roen have used multiple hotel rooms within the Minneapolis, MN, area, and abandoned multiple items at these hotel rooms that are affiliated with the manufacturing and distribution of CFT FRNs.
- 9. Agents from the Milwaukee Resident Office have identified that Rochelle Roen and Corey Barnes are responsible for a large amount of CFT FRNs which were passed within the Oshkosh, WI, and Appleton, WI, areas. These agents have learned that Rochelle Roen currently resides in an apartment at 2133 Evan Street, Apartment #5, Oshkosh, WI.
- 10. Rochelle Roen has been identified as passing several CFT FRNs in the district of the Minneapolis Field Office and Milwaukee Resident Office. Barnes, Wesley, and Roen were indicted by a Federal Grand Jury for violations of Conspiracy and Uttering Counterfeit U.S. Currency in U.S. District Court, District of Minnesota on October 5, 2010.
- 11. Federal Arrest Warrants were issued by the U.S. District Court, District of Minnesota for Barnes, Wesley and Roen on October 6, 2010.
- 12. Rochelle Roen's cellular telephone number has been obtained from two separate sources. The biological father of Rochelle Roen's three year old daughter, Robert Smaller, has provided cellular phone number 612-570-2745 to agents of the U.S. Secret Service, Minneapolis Field Office as the phone number he contacts Rochelle L. Roen. Suspect Corey Barnes also provided the same number to agents of the U.S. Secret Service, Minneapolis Field Office, as the cellular phone number Rochelle L. Roen utilizes upon his arrest on 10/18/10.

CONCLUSION

13. Based on the information provided above, I believe that Rochelle L. Roen has manufactured and passed counterfeit U.S. Federal Reserve Notes in Minnesota and Wisconsin. I also believe that Roen will travel to Oshkosh, WI in the future to return to her residence. I believe that cell site information for the target telephone number, 612-570-2745, will alert law enforcement when Roen is in the Oshkosh, WI area, thus assisting law enforcement in physically finding Roen, thus allowing us to arrest her for the outstanding Federal Arrest Warrant for Conspiracy to Distribute and Pass Counterfeit U.S. Federal Reserve Notes as detailed in Title 18 USC Code 371 and 472.

SCOTT A. BATES

Sworn to and subscribed before me

this 26 day of October, 2010.

WILLIAM E. CALLAHAN, JR. United States Magistrate Judge